

REMARKS

The claims have been amended to more clearly define the present invention. The elements of cancelled dependent claim 3 have been incorporated into independent claim 1; the elements of cancelled claim 11 have been incorporated into independent claim 9; and the limitations of cancelled claim 19 have been incorporated into independent claim 17.

Accordingly, it is submitted that Claims 1, 2, 4-7, 9, 10, 12-15, 17, 18, and 20-23 as amended are not anticipated and thus patentable over Liu et al. (US5,706,449) under 35 U.S.C. 102(b). In order to reject under 35 USC 102, the reference must teach every element of the invention without modification. Liu does not meet this standard.

In the claims of the present invention, two segments of alphanumeric text in a displayed document having continuous lines of alphanumeric text are respectively designated, and a swap function is selected by a user to thereby swap the locations of the segments with each other. Liu discloses that two designated columns in a displayed spreadsheet may be swapped with one another. Thus, Liu does not teach the claimed elements of swapping two segments of alphanumeric text in a displayed text document having continuous lines of text.

Liu is concerned only with spreadsheet table functions, and involves nothing relative to text processing expedients, such as that of the claimed invention which involves sentences, paragraphs or pages in text documents having continuous lines of text.

The distinction between text documents and spreadsheets is clearly understood by those skilled in the art. While both contain data which may be semantically called alphanumeric, the document structures and editing functions

in the text document processing art are understood to be very distinct from the numerical table organization of the spreadsheet art. Thus, a spreadsheet table is never regarded as text document by those skilled in the art. In order to avoid any possible literal or semantic reading of the present claims on the tables of spreadsheets, the amended claims define the text document as having continuous lines of text.

In this connection, Examiner points to column 3, lines 27-35 of Liu for a teaching relative to the use of swapping in text processing of sentences and paragraphs. Applicants submit that there is nothing pertinent in these sections. This section relates only to the manipulation of columns in spreadsheet tables including swapping of columns. Where this section mentions text, it relates to finding text in columns. Applicants concede that columns in spreadsheet tables may each include text entries but these are not in the form of the continuous lines of text in a text document.

Accordingly, it is submitted that the Examiner's interpretation of the Liu Patent does not meet the very specific requirements of 35 USC 102 that the reference must clearly teach every element of the invention without modification. It is submitted that the tabular spreadsheet of Liu fails to disclose every element of the invention without modification since Liu fails to disclose the swapping of two segments of alphanumeric text in the editing of a text document having continuous lines of text.

The rejection under 35 U.S.C. 103(a) of claims 8, 16, and 24 as being obvious over the combination of Liu in view of Higashio (US5,900,869) is respectfully traversed. It is submitted that Higashio's image switching does not swap the positions of two displayed images with each other. Rather, the switching as cited by Examiner (col. lines 43-67 and

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Fig. 1 switches only between a smaller version and a full screen version of the same image. Accordingly it is not seen how Higashio modifies the teaching of Liu to suggest one full page of alphanumeric text containing an image with another full page of alphanumeric text containing an image.

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In view of the forgoing, it is that claims 1, 2, 4-10, 14-18, and 20-24 are now in condition for allowance, and such allowance is respectfully requested.

Respectfully submitted,

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